

INITIAL DOCUMENT REQUEST

, 2018

(the “Registrant”)

Examination Period:

Information and Records requested for the “Examination Period” of 2018, unless otherwise noted.

For the places where the phrase “ESG and/or SRI” is used, we refer to terms and concepts such as or similar to “responsible,” “socially responsible,” “sustainable,” “green,” “ethical,” “impact” or good “governance.” Where the phrase “ESG and/or SRI Investments” is used, we refer to any kind of investment that Registrant has evaluated and recommended to advisory clients where it considered factors or matters that relate to ESG and/or SRI, including, but not limited to

Information and Records to be Provided

Please provide items 1, 2, 3, 16, 18, and 20 by 2018. The remaining items are requested by 2018.

1. Registrant’s organization chart showing ownership percentages of the Registrant and control persons, and a schedule or chart of all affiliated entities. Include all entities that control, are controlled by, or are under common control with, Registrant.
2. Registrant’s functional organization chart showing operating function reporting lines (include the total number of employees/personnel within each function, as well as the names and titles of all such employees/personnel.
3. List of Registrant’s current and former employees (full-time and part-time), independent contractors, partners, officers and/or directors during the Examination Period, along with their respective titles, office locations (if Registrant has more than one office address), hire dates, and dates they terminated employment (if applicable).
4. Pertaining to ESG and/or SRI Investments: (i) state what is Registrant’s internal definition of any terms that relate to ESG and/or SRI that are also used in disclosure or marketing materials provided to prospective or current clients or investors¹; (ii) list and provide a description for each ESG and/or SRI factor utilized (e.g., environmental, social, governance, etc.); and (iii) provide copies of any written policies and procedures relating to the application of such factors in determining whether an investment qualifies as an appropriate ESG and/or SRI Investment or receives an ESG and/or SRI score. Include versions currently in use and any previous versions utilized during the Examination Period.

¹ If Registrant relies on a third party’s definition of ESG and/or SRI Investments, please provide the requested information as used by the third party.

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5. State whether Registrant adheres to the UN Principles for Responsible Investment, and if so, please provide written documentation of Registrant's consideration of these principles in its investment selection and portfolio management processes.
6. A table listing all ESG and/or SRI Investments recommended to prospective or current clients during the Examination Period (even if not ultimately invested by any non-discretionary client accounts), including the following information:
 - A. The full name of the investment;
 - B. CUSIP/security identifier/ticker;
 - C. Derivative counterparty (if applicable);
 - D. Date first recommended to prospective or current clients (even if preceding the Examination Period);
 - E. Total amount invested by all discretionary client accounts (peak quarter-end holding);
 - F. Total amount recommended, but not invested, by all non-discretionary client accounts;
 - G. If Registrant uses a scoring system for ESG and/or SRI Investments, include the corresponding scores for each investment during the Examination Period;
 - H. For each ESG and/or SRI Investment that is proprietary to or affiliated with Registrant, include (i) the registration number, if any, (ii) date operations commenced, (iii) total net assets, (iv) net asset value per share (or other investment unit), and (v) number of clients;
 - I. A description and total amount of all cash and non-cash compensation received by Registrant, its affiliates, and/or its personnel for recommending the investment; and
 - J. A description of (or records identifying) the ESG and/or SRI factors that formed the basis for the recommendation.
7. For the Examination Period and the preceding twelve month period, provide a list of ESG and/or SRI Investments that were previously, but no longer, recommended to prospective or current clients and a written explanation for why the investment is no longer recommended. If more than five investments pertain, explain why the five largest previously held positions (dollars invested across all clients) are no longer recommended. Please include or identify existing records that contain the explanations sought in this request.
8. If Registrant uses a proprietary scoring system related to ESG and/or SRI Investments (or scoring by an affiliated entity): (i) provide a written explanation about the methodology used to assess the score; (ii) describe the factors underlying each score level; (iii) state how often the score is evaluated; (iv) state whether prospective or current clients are provided with the score(s); and (v) provide copies of any formal, written procedures pertaining to the scoring system. If not included in the formal, written procedures, please include or identify existing records that contain the explanations and descriptions sought in this request.
9. If Registrant uses a third-party scoring system (or scoring by a sub-adviser that is not a commonly-controlled affiliate), (i) list the name and website for such scorer; (ii) describe

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why the particular scorer was selected; (iii) describe how Registrant uses the scores; (iv) describe how often the score is evaluated; (v) state whether prospective or current clients are provided with the score(s); and (vi) provide a list of all third-party scoring reports used during the Examination Period.

10. A list of issuers, if any, Registrant has engaged with about ESG and/or SRI matters (e.g., oral or written correspondence directly with issuer management personnel or investor relations) during the Examination Period.
11. State if Registrant has the ability to submit shareholder proposals for any companies in which your clients have invested. If so, please provide a list of any proposals submitted that pertain to ESG and/or SRI matters.
12. State if Registrant uses model investment strategies (e.g., a model portfolio that client accounts replicate). If so, describe each investment strategy and explain how Registrant selects the investments and monitors and assesses performance related to ESG and/or SRI factors. Please include or identify existing records that contain these descriptions and explanations.
13. Please provide the information below for all advisory clients in MS Excel.
 - A. The account number, name and current balance, as of _____, 2018;
 - B. Whether the client is a related person, affiliated person, or a proprietary account;
 - C. The type of account (e.g., individual, defined benefit retirement plan, registered fund, unregistered fund, etc.);
 - D. The account custodian(s);
 - E. Whether the custodian sends periodic account statements directly using client mailing address, and whether the client's mailing address is the same as the Registrant's;
 - F. Whether the delivery of account statements is electronic, and if so, a copy of the authorization and the form of electronic delivery (e.g., email or website login);
 - G. Whether the Registrant has discretionary authority;
 - H. Whether the Registrant or related persons are deemed to have custody of, possession of, or access to the client's assets;
 - I. The investment strategy (e.g., foreign equity-ESG/SRI, foreign equity (no ESG/SRI focus), high-yield bonds-ESG/SRI, high-yield bonds (no ESG/SRI focus), long-short equity-ESG/SRI, etc.) and the performance composite in which it is included, if any;
 - J. The account portfolio manager(s);
 - K. The account billing structure (e.g., percentage amount charged on assets under advisement or fixed fee amount for each service provided);
 - L. The value of each client's account that was used for purposes of calculating its advisory fee for the most recent billing period;
 - M. Whether the client pays a performance fee;
 - N. Whether advisory fees are paid directly from the client's custodial account; and
 - O. Account inception date.

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14. The names and location of all service providers used by the Registrant during the Examination Period and the services they perform (including but not limited to auditor, administrator, custodian, compliance consultant, outside legal counsel, executing brokers, valuation consultant, and due diligence consultants used during the Examination Period). Please separately identify which service providers are affiliated with Registrant.
15. A copy of any contracts or agreements (and any amendments thereto) with service providers that provided due diligence, screening information, or other services to Registrant during the Examination Period in connection with the selection or recommendation of specific ESG and/or SRI Investments. Please provide copies of three examples of such correspondence with each service provider, as well as a schedule that lists invoices and payments to or from the service providers. Please separately identify which service providers, if any, are affiliated with Registrant.
16. A copy of Registrant's written policies and procedures, including code of ethics, compliance manual, and any other operating policies and procedures and corresponding exhibits and schedules referenced in the compliance or operating policies and procedures. Please include the versions currently in use and any previous versions utilized during the Examination Period, and include all materials, whether or not they relate to ESG and/or SRI matters.
17. State if you have proxy voting authority. If so, provide the following:
 - A. Proxy voting policies and procedures;
 - B. Proxy statements received regarding client securities;
 - C. Records of votes they cast on behalf of clients; and
 - D. 5 examples (or all if fewer) of any documents prepared by Registrant, its affiliates, and/or its personnel, that were material to making a decision how to vote on an ESG and/or SRI matter, or that memorialized the basis for the decision.
18. A copy of any periodic compliance or internal audit evaluations that assessed the adequacy of the design or implementation of the above-mentioned compliance and operating policies and procedures (regulatory compliance or ESG and/or SRI Investments).
19. Registrant's trade blotter for the Examination Period (i.e., purchases and sales journal) that lists transactions (including all trade errors, cancellations, re-bills, and reallocations) in securities and other financial instruments for: current and former clients; proprietary and/or trading accounts, and access persons. Please provide this information in MS Excel, as indicated in Exhibit 1, with an additional column identifying whether the transaction pertains to ESG and/or SRI Investments or has an associated ESG and/or SRI score.
20. Lists of all securities or any type of financial instrument (including cash and collateral) held in current and former client accounts, proprietary and/or trading accounts, and access person accounts, as of _____, and semiannually thereafter through _____.

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2018. For each position, include the information specified in Exhibit 1 below in MS Excel, with an additional column identifying whether the holding pertains to ESG and/or SRI investments or has an associated ESG and/or SRI score.

21. All pitch books, one-on-one presentations, pamphlets, promotional brochures, prospectuses, offering memoranda, periodic newsletters, performance reports separate from custodial statements, and any other offering, advertising and/or marketing materials furnished to prospective or current clients or investors, including but not limited to all such materials that discuss any ESG and/or SRI Investments. Include all websites and blogs used by Registrant during the Examination Period, as well as printouts or electronic archives of each version during the Examination Period.
22. A copy of all versions of Registrant's standard advisory contract or limited partnership agreement (include all versions that have varying provisions, such as performance-based fees or parameters for ESG and/or SRI Investments).
23. Registrant's three most profitable and three least profitable (including unrealized gain or loss) investment decisions based on total return of positions opened and closed for each ESG and/or SRI Investment offered to prospective or current clients during the Examination Period. Please include the purchase date, sale date, percentage of gain and/or loss, and dollar amount of the gain and/or loss. Please also include a copy of all research and due diligence files (e.g., personal research notes, notes of meetings with issuer management personnel or with customers and consultants/experts, third-party analyst reports, issuer private placement memoranda, issuer financial statements, etc.) for these investments that were used during the Examination Period.
24. Performance returns (e.g., total return on a gross or net basis) for each quarter during the Examination Period, whether or not they have been presented in marketing materials, for each client and proprietary/related account. The preferred format for this information is MS Excel. Also, include copies of any internal analysis (or point to any presentation to prospective or current clients or investors provided in response to prior requests) that quantify investment returns from specifically ESG and/or SRI Investments, or measure any other performance metric associated with ESG and/or SRI Investments (e.g., units of carbon emissions reduced, quantifiable improvement in social or governance factors at issuers).
25. State whether you have received any awards or recognitions related to ESG and/or SRI during the Examination Period. If so, (i) identify all such awards and recognitions, including the dates received; (ii) state whether you have communicated with prospective or current clients or investors regarding your receipt of such awards and recognitions; and (iii) produce copies of all internet postings, written correspondence, and advertising/marketing materials reflecting your receipt of such awards and recognitions.